

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Application of FORENSIC NEWS LLC and
SCOTT STEDMAN for an Order Pursuant to 28
U.S.C. § 1782 to Conduct Discovery for Use in a
Foreign Proceeding.

Case No. 22-MC-347 (AT)

**DECLARATION OF LEE R. CRAIN IN FURTHER SUPPORT OF
PETITIONERS' APPLICATION FOR DISCOVERY PURSUANT TO
28 U.S.C. § 1782 AND IN OPPOSITION TO WALTER SORIANO'S
MOTION, IN THE ALTERNATIVE, TO STAY**

I, Lee R. Crain, hereby declare under penalty of perjury, pursuant to 28 U.S.C. § 1746,
that the following is true and correct:

1. I am an associate in the law firm of Gibson, Dunn & Crutcher LLP, and am
admitted to practice law in the State of New York and the bar of this Court. My firm represents
Forensic News LLC and Scott Stedman (the "Petitioners"). I make this declaration in further
support of Petitioners' Application for Discovery Pursuant to 28 U.S.C. § 1782 ("Petitioners'
Application"). I am over the age of eighteen years and am not a party to this action.

2. On January 20, 2023, putative intervenor Walter Soriano moved to intervene in
this action. Soriano's counsel did not meet and confer with Petitioners' counsel prior to filing
their application in this Court. Shortly after reviewing Soriano's filings, Petitioners emailed
Soriano's counsel to meet and confer on their motion to intervene, their opposition to Petitioners'
Application, and their request for a stay. Petitioners met and conferred with Soriano's counsel
on January 27, 2023.

3. Attached hereto as **Exhibit 1** is a true and correct copy of an email exchange between Petitioners' counsel and Respondent's counsel, dated from January 20, 2023 to January 30, 2023, memorializing the parties' January 27, 2023 meet and confer.

4. Attached hereto as **Exhibit 2** is a true and correct copy of the Application Notice for the anti-suit injunction filed in the High Court of Justice, King's Bench Division, on January 19, 2023 in *Walter Tzvi Soriano v. Forensic News LLC, et al.* (Claim No. QB-2020-002450).

5. Attached hereto as **Exhibit 3** is a true and correct copy of the Fourth Witness Statement of Patrick Doris filed in the High Court of Justice, King's Bench Division, on February 1, 2023 in *Walter Tzvi Soriano v. Forensic News LLC, et al.* (Claim No. QB-2020-002450).

6. Attached hereto as **Exhibit 4** is a true and correct copy of Petitioners' Skeleton Argument For Hearing On 6 February 2023 filed in the High Court of Justice, King's Bench Division, on February 3, 2023 in *Walter Tzvi Soriano v. Forensic News LLC, et al.* (Claim No. QB-2020-002450).

I declare under penalty of perjury that the foregoing is true and correct.

Dated: February 3, 2023
New York, New York

/s/ Lee R. Crain
Lee R. Crain